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NATIONAL LIABILITY & FIRE INSURANCE)	
CO. and BOAT OWNERS ASSOCIATION OF)	
OF THE UNITED STATES)	Civil Action:
Plaintiffs)	No: 17-cv-0038-S-PAS
)	
v.)	In Admiralty
)	
NATHAN CARMAN)	
Defendant.)	
)	

Now comes the Defendant and submits the below list of potential trial exhibit. By identifying and list these exhibits below the Defendant does not stipulate to the admission into evidence of these exhibits nor waive any objections to their admission which may be raised at trial.

- 1

Def's Ex. # 21, Def's RPDs to Plaintiff NLFIC with Pl's Original and Supp Responses
 Def's Ex. # 22, Plaintiffs Initial & all Supplemental 26(a)(1) disclosures
 Def's Ex. # 23, Certified copy, MA Enviro Police, Chain of title
 Def's Ex. # 24, 2016 Federal Tuna Permit
 Def's Ex. # 25, Ct. Assault weapon ban, list of banned rifles (ECF Doc. # 76-3)

Def's Ex. # 30, E-Mail dated 11/30/15, BoatUS to Carman with Attachment
 Def's Ex. # 31, E-Mail dated 12/02/15, BoatUS to Carman with Attached Quote
 Def's Ex. # 32, E-Mail dated 12/16/15, BoatUS to Carman inquiring re quote
 Def's Ex. # 33, E-Mail dated 12/17/15, BoatUS to Carman with Attached 2nd Quote
 Def's Ex. # 34, E-Mail dated 12/17/15, BoatUS to Carman inquiring how we did?
 Def's Ex. # 35, E-Mail dated 12/21/15, Carman to BoatUS with Attached Supp. survey
 Def's Ex. # 36, E-Mail dated 12/21/15, BoatUS to Carman with Attached marine ins.binder
 Def's Ex. # 37, E-Mail sent Feb 2016, BoatUS to Carman confirming Automatic payment
 Def's Ex. # 38, E-Mail dated 2/17/16, BoatUS to Carman Req signed Ins. App. & Rec.
 Def's Ex. # 39, E-Mail dated 2/19/16, Carman to BoatUS with signed Ins. App. & Rec.
 Def's Ex. # 40, E-Mail sent May 2016, BoatUS to Carman, Membership E-Line
 Def's Ex. # 41, E-Mail dated 10/12/16, BoatUS to Carman acknowledging hull claim.
 Def's Ex. # 42, E-Mail dated 10/19/16, Carman to BoatUS (Charlesworth) with proof of claim
 Def's Ex. # 43, E-Mail dated 10/20/16, Carman to BoatUS (Charlesworth) inquiring of status
 Def's Ex. # 44, E-Mail dated 10/20/16, BoatUS (Charlesworth) to Carman
 Def's Ex. # 45, E-Mail dated 11/1/16, BoatUS (Charlesworth) to Carman, I neglected to inform
 Def's Ex. # 46, E-Mail dated 11/11/16, BoatUS (Charlesworth) to Carman, Req. Examination
 Def's Ex. # 47, E-Mail dated 11/29/16, BoatUS to Carman, Re: req. for copy of Policy
 Def's Ex. # 48, E-Mail dated 12/25/16, BoatUS to Carman, Your Policy expired Dec 22, 2016.
 Def's Ex. # 49, E-Mail dated 01/27/16, BoatUS (Charlesworth) to Carman, Denying claim w
 three attachments
 Def's Ex. # 50, E-Mail dated 01/27/16, BoatUS to Carman, w attached Vermont Endorsement

Def's Ex. # 60, Photo, Cooling intake
 Def's Ex. # 61, Photo, Washdown Pump
 Def's Ex. # 62, Photo, Washdown pump w new Intake installed
 Def's Ex. # 63, Annotated Photos re summer 2016 engine repair (multiple photos)
 Def's Ex. # 64, Photo from C. Roth "124109"
 Def's Ex. # 65, Photo from C. Roth, "124754"

Def's Ex. # 70, All 129 Photo's produced with Pl's 6/6/18 Supp 26(a)(1) disclosure (additional Woods photos)
 Def's Ex. # 71, Additional Woods Photo, "DSC00428"
 Def's Ex. # 72, Additional Woods Photo, "DSC00429"
 Def's Ex. # 73, Additional Woods Photo, "DSC00430"
 Def's Ex. # 74, Additional Woods Photo, "DSC00431"
 Def's Ex. # 75, Additional Woods Photo, "DSC00433"
 Def's Ex. # 76, Additional Woods Photo, "DSC00434"
 Def's Ex. # 77, Additional Woods Photo, "DSC00437"
 Def's Ex. # 78, Additional Woods Photo, "DSC00475"

Def's Ex. # 79, Additional Woods Photo, "DSC00477"
Def's Ex. # 80, Additional Woods Photo, "DSC00478"
Def's Ex. # 81, Additional Woods Photo, "DSC00479"
Def's Ex. # 82, Additional Woods Photo, "DSC00707"
Def's Ex. # 83, Additional Woods Photo, "DSC00708"
Def's Ex. # 84, Additional Woods Photo, "DSC00766"
Def's Ex. # 85, Additional Woods Photo, "DSC00767"
Def's Ex. # 86, Additional Woods Photo, "DSC00768"
Def's Ex. # 87, Additional Woods Photo, "DSC00769"
Def's Ex. # 88, Additional Woods Photo, "DSC00771"
Def's Ex. # 89, Additional Woods Photo, "DSC00807"
Def's Ex. # 90, Additional Woods Photo, "DSC00808"
Def's Ex. # 91, Additional Woods Photo, "DSC00813"
Def's Ex. # 92, Additional Woods Photo, "DSC00814"
Def's Ex. # 93, Additional Woods Photo, "DSC00937"
Def's Ex. # 94, Additional Woods Photo, "DSC01026"
Def's Ex. # 95, Additional Woods Photo, "DSC01027"
Def's Ex. # 96, Additional Woods Photo, "DSC01125"
Def's Ex. # 97, Additional Woods Photo, "DSC01126"
Def's Ex. # 98, Additional Woods Photo, "DSC01128"
Def's Ex. # 99, Additional Woods Photo, "DSC01133"
Def's Ex. # 100, Additional Woods Photo, "DSC01137"
Def's Ex. # 101, Additional Woods Photo, "DSC01280"
Def's Ex. # 102, Additional Woods Photo, "DSC01290"
Def's Ex. # 103, Additional Woods Photo, "DSC01356"
Def's Ex. # 104, Additional Woods Photo, "DSC01358"
Def's Ex. # 105, Additional Woods Photo, "DSC00428"

Def's Ex. # 110, Photo from Def.'s 26(a)(1) "P3060008"
Def's Ex. # 111, Photo from Def.'s 26(a)(1) "P3060009"
Def's Ex. # 112, Photo from Def.'s 26(a)(1) "P3060010"
Def's Ex. # 113, Photo from Def.'s 26(a)(1) "P3060011"
Def's Ex. # 114, Photo from Def.'s 26(a)(1) "P3060012"
Def's Ex. # 115, Photo from Def.'s 26(a)(1) "P3060013"
Def's Ex. # 116, Photo from Def.'s 26(a)(1) "P3060014"
Def's Ex. # 117, Photo from Def.'s 26(a)(1) "P3060015"
Def's Ex. # 118, Photo from Def.'s 26(a)(1) "P3060016"

Def's Ex. # 120, Survey report before sea-trial
Def's Ex. # 121, Sea-trial report
Def's Ex. # 122, Survey report incorporating sea-trial

Def's Ex. # 130, Subpoena to Brian Woods, Ex. #1, Depo of B. Woods
Def's Ex. # 131, Flash Drive, Ex. #2, Depo of Woods
Def's Ex. # 132, Photo, Ex. #3, Depo of Woods
Def's Ex. # 134, Photo, Ex. #4, Depo of Woods

Def's Ex. # 135, Purchase Option Agreement form, Ex. #5, Depo of Woods
Def's Ex. # 136, Invoice, Ex. #6, Depo of Woods
Def's Ex. # 137, Bag of screws, bolts and fitting, Ex. 7, Depo of Woods
Def's Ex. # 138, Installation Instructions, Ex. 8, Depo of Woods
Def's Ex. # 139, Trim Tab, Ex. 9, Depo of Woods
Def's Ex. # 140, Video of Chicken Pox in Cape Cod Canal, From Woods Depo Ex. #2
Def's Ex. # 141, Plug, Ex. 10, Depo of Woods
Def's Ex. # 142, 14 JC 31 Construction Photos (from Woods Depo Ex #2)
Def's Ex. # 143, 39 JC 31 Photos at Green Harbor (folder in Woods Depo Ex. #2)

Def's Ex. # 150, Denial Letter, Ex. # 1, 1/16/18 Depo of Charlesworth
Def's Ex. # 151, Webscreen Printout, Ex. # 2, 1/16/18 Depo of Charlesworth
Def's Ex. # 152, Declaration Page, Ex. # 3, 1/16/18 Depo of Charlesworth
Def's Ex. # 153, E948, Ex. # 4, 1/16/18 Depo of Charlesworth
Def's Ex. # 154, A101, Ex. # 5, 1/16/18 Depo of Charlesworth
Def's Ex. # 155, A105, Ex. # 6, 1/16/18 Depo of Charlesworth
Def's Ex. # 156, VT96, Ex. # 7, 1/16/18 Depo of Charlesworth
Def's Ex. # 157, March 2016 Endorsement, Ex. # 8, 1/16/18 Depo of Charlesworth
Def's Ex. # 158, Booklet, Ex. # 9, 1/16/18 Depo of Charlesworth
Def's Ex. # 159, 10/12/16 E-Mail, Ex. # 10, 1/16/18 Depo of Charlesworth
Def's Ex. # 160, 10/21/16 E-Mail, Ex. # 11, 1/16/18 Depo of Charlesworth
Def's Ex. # 161, 11/01/16 E-Mail, Ex. # 12, 1/16/18 Depo of Charlesworth
Def's Ex. # 162, 11/11/16 Letter, Ex. # 13, 1/16/18 Depo of Charlesworth
Def's Ex. # 163, 10/19/16 E-Mail, Ex. # 14, 1/16/18 Depo of Charlesworth

Def's Ex. # 164, Purchase Records, Ex. #2, Depo of Carman
Def's Ex. # 165, Proof of Claim, Ex. #9, Depo of Carman
Def's Ex. # 166, Photo of Boat, Ex. #10, Depo of Carman
Def's Ex. # 167, Photo, Ex. #13, Depo of Carman
Def's Ex. # 168, JB Water Weld, Ex. #15, Depo of Carman
Def's Ex. # 169, Web Page BoatUS website, Ex. #21, Depo of Carman
Def's Ex. # 170, Web Page BoatUS web site, Ex. #22, Depo of Carman
Def's Ex. # 171, Letter dated 4/28/16, Ex. #23, Depo of Carman
Def's Ex. # 172, 11/1/16 E-Mail from Charlesworth, Ex. #28, Depo of Carman
Def's Ex. # 173, Photo of Boat, Ex. #30, Depo of Carman
Def's Ex. # 174, Photo of Pilot House, Ex. #31, Depo of Carman
Def's Ex. # 175, Photo of helm, Ex. #32, Depo of Carman
Def's Ex. # 176, Photo Of P side, Ex. #33, Depo of Carman

Def's Ex. # 180, Exhibit #1, 02/21/2018 30(b)(6) Depo. Of BoatUS by M. Pellerin
Def's Ex. # 181, Exhibit #2, 02/21/2018 30(b)(6) Depo. Of BoatUS by M. Pellerin
Def's Ex. # 182, Exhibit #3, 02/21/2018 30(b)(6) Depo. Of BoatUS by M. Pellerin
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Def's Ex. # 186, Exhibit #7, 02/21/2018 30(b)(6) Depo. Of BoatUS by M. Pellerin

Def's Ex. # 187, Exhibit #8, 02/21/2018 30(b)(6) Depo. Of BoatUS by M. Pellerin
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Def's Ex. # 204, Exhibit #26, 02/21/2018 30(b)(6) Depo. Of BoatUS by M. Pellerin
Def's Ex. # 205, Exhibit #27, 02/21/2018 30(b)(6) Depo. Of BoatUS by M. Pellerin
Def's Ex. # 206, Exhibit #28, 02/21/2018 30(b)(6) Depo. Of BoatUS by M. Pellerin
Def's Ex. # 207, Exhibit #29, 02/21/2018 30(b)(6) Depo. Of BoatUS by M. Pellerin
Def's Ex. # 208, Exhibit #30, 02/21/2018 30(b)(6) Depo. Of BoatUS by M. Pellerin
Def's Ex. # 209, Exhibit #31, 02/21/2018 30(b)(6) Depo. Of BoatUS by M. Pellerin

Def's Ex. # 210, Exhibit #1, Depo, of Christopher Roth Sr.
Def's Ex. # 211, Exhibit #2, Depo, of Christopher Roth Sr.
Def's Ex. # 212, Exhibit #3, Depo, of Christopher Roth Sr.
Def's Ex. # 213, Exhibit #4, Depo, of Christopher Roth Sr.
Def's Ex. # 214, Exhibit #5, Depo, of Christopher Roth Sr.
Def's Ex. # 215, Exhibit #6, Depo, of Christopher Roth Sr.
Def's Ex. # 216, Exhibit #7, Depo, of Christopher Roth Sr.
Def's Ex. # 217, Exhibit #8, Depo, of Christopher Roth Sr.
Def's Ex. # 218, Exhibit #9, Depo, of Christopher Roth Sr.
Def's Ex. # 219, Exhibit #10, Depo, of Christopher Roth Sr.
Def's Ex. # 220, Exhibit #11, Depo, of Christopher Roth Sr.
Def's Ex. # 221, Exhibit #12, Depo, of Christopher Roth Sr.
Def's Ex. # 222, Exhibit #13, Depo, of Christopher Roth Sr.

Def's Ex. # 230, Exhibit #1, 4/25/18 30(b)(6) depo of NFLIC by Charlesworth
Def's Ex. # 231, Exhibit #2, 4/25/18 30(b)(6) depo of NFLIC by Charlesworth
Def's Ex. # 232, Exhibit #3, 4/26/18 30(b)(6) depo of NFLIC by Mehta
Def's Ex. # 233, Exhibit #4, 4/26/18 30(b)(6) depo of NFLIC by Mehta
Def's Ex. # 234, Exhibit #5, 4/26/18 30(b)(6) depo of NFLIC by Mehta
Def's Ex. # 235, Exhibit #6, 4/26/18 30(b)(6) depo of NFLIC by Mehta

Def's Ex. # 236, Exhibit #1, Depo. Of Limeburner
Def's Ex. # 237, Exhibit #2, Depo. Of Limeburner
Def's Ex. # 238, Exhibit #3, Depo. Of Limeburner
Def's Ex. # 239, Exhibit #4, Depo. Of Limeburner
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Def's Ex. # 253, Exhibit #18, Depo. Of Limeburner
Def's Ex. # 254, Exhibit #19, Depo. Of Limeburner
Def's Ex. # 255, Exhibit #20, Depo. Of Limeburner
Def's Ex. # 256, Exhibit #21, Depo. Of Limeburner
Def's Ex. # 257, Exhibit #22, Depo. Of Limeburner
Def's Ex. # 258, Exhibit #23, Depo. Of Limeburner
Def's Ex. # 259, Exhibit #24, Depo. Of Limeburner
Def's Ex. # 260, Exhibit #25, Depo. Of Limeburner
Def's Ex. # 261, Exhibit #26, Depo. Of Limeburner
Def's Ex. # 262, Exhibit #27, Depo. Of Limeburner
Def's Ex. # 263, Exhibit #28, Depo. Of Limeburner
Def's Ex. # 264, Exhibit #29, Depo. Of Limeburner
Def's Ex. # 265, Exhibit #30, Depo. Of Limeburner
Def's Ex. # 266, Exhibit #31, Depo. Of Limeburner

Def's Ex. # 270, Exhibit #1, Depo of Klopman
Def's Ex. # 271, Exhibit #2, Depo of Klopman
Def's Ex. # 272, Exhibit #3, Depo of Klopman
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Def's Ex. # 300, Exhibit #31, Depo of Klopman
Def's Ex. # 301, Exhibit #32, Depo of Klopman

Def's Ex. # 310, Exhibit #1, 4/11/19 Expert deposition of Pellerin
Def's Ex. # 311, Exhibit #1, 4/11/19 Expert deposition of Pellerin
Def's Ex. # 312, Exhibit #1, 4/11/19 Expert deposition of Pellerin
Def's Ex. # 313, Exhibit #1, 4/11/19 Expert deposition of Pellerin
Def's Ex. # 314, Exhibit #1, 4/11/19 Expert deposition of Pellerin

Def's Ex. # 320, Video on Flashdrive, Exhibit #2, Depo of "Ms. Y"

Respectfully Submitted
On behalf of the Defendant,
Nathan Carman

/s/ David F. Anderson
David F. Anderson
Latti & Anderson LLP
30 Union Wharf
Boston, MA 02109
(617) 523-1000
DAnderson@LattiAnderson.com

Dated: July 17, 2019

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on the above date, I electronically filed the above pleading with the Clerk of the Court using CM/ECF system which will send notification of such filing(s) to all counsel of record for all parties.

/s/David F. Anderson
David F. Anderson